

**IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

JO-NATHAN LUTON,	)	CASE NO: 1:19-CV-468
	)	
Plaintiff,	)	JUDGE DAN POLSTER
	)	
v.	)	DEFENDANT STEVEN FEDORKO'S
	)	INITIAL DISCLOSURES
CITY OF CLEVELAND, ET AL.	)	
	)	
Defendants.	)	
	)	
	)	

Now comes Defendant Steven Fedorko, by and through undersigned counsel, pursuant to F.R.C.P. 26(a)(1)(A) states:

I. INDIVIDUALS LIKELY TO HAVE DISCOVERABLE INFORMATION

1. Plaintiff
2. All Defendants
3. Officer Michael Boyd
4. Percetta Luton
5. Becky Banks
6. Samuel Crook, Jr.
7. Various records custodians as needed to authenticate records

Other individuals identified by Plaintiffs or Co-Defendants, may also have information relevant to the case. Defendant Fedorko reserves the right to add additional witnesses as they may become known during discovery.

II. DOCUMENTS

Without intending to limit the scope of this disclosure, Defendants identify the following documents: No such documents, data, or tangible things within Defendant Fedorko's control. Defendant reserves the right to supplement this disclosure, and to use any documents that become known to them, through further discovery or investigation.

III. DAMAGES

Defendant does not claim damages at this time, but reserves the right to identify damages in the future, including but not limited to seeking an award of attorney fees.

IV. INSURANCE

Defendants is not aware of any insurance agreement that could be used to satisfy part or all of any judgment in this matter.

Respectfully submitted,

MARSHALL DENNEHEY WARNER  
COLEMAN & GOGGIN

By: /s/ **Jillian L. Dinehart**  
KEITH HANSBROUGH (0072671)  
JILLIAN L. DINEHART (0086993)  
127 Public Square, Suite 3510  
Cleveland, Ohio 44114  
Phone: 216.912.3809  
Fax: 216.912.3801  
Email: kkhansbrough@mdwcg.com  
jldinehart@mdwcg.com  
*Counsel for Defendant Fedorko*

**CERTIFICATE OF SERVICE**

I hereby certify that on June 4, 2019, a copy of the foregoing was filed electronically.

Notice of this filing will be sent to all parties by operation of the Court's electronic filing system.

By: /s/ *Jillian L. Dinehart*  
JILLIAN L. DINEHART (0086993)  
*Counsel for Defendant Fedorko*